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Ramon Victoria

January 31, 2019

**Attention:**

File #: MuzzarellaPi

Inv #: Sample

**RE:** Victor Hugo Ortega Hernandez et al v. Muzzarella Inc. et al

<b>DATE</b>	<b>DESCRIPTION</b>	<b>HOURS</b>	<b>AMOUNT</b>	<b>LAWYER</b>
Jul-27-17	Initial interview with client	1.00	175.00	PL
Aug-04-17	contacted client and discussed facts of case	0.10	45.00	MF
Aug-13-17	researched lexis and drafted complaint	2.80	1,260.00	MF
Aug-14-17	reviewed and corrected complaint; discussed with Es the correct name of the owner; requested that Es make corrections to the complaint	1.90	855.00	MF
Aug-15-17	finalized and filed complaint	2.00	350.00	PL
Aug-16-17	drafted damage calculations	0.75	131.25	PL
Oct-25-17	got status of case from SI	0.10	45.00	MF
Jan-03-18	phone call with client to discuss case	0.10	10.00	PL
Jan-09-18	Telephone conference with opposing counsel re: settlement and time to answer	0.10	35.00	SI
Feb-16-18	Telephone conference with Opposing counsel regarding extension of time to file answer	0.10	35.00	SI
Feb-19-18	got status of case from SI	0.10	45.00	MF

Mar-15-18	Drafted initial conference materials	0.20	70.00	SI
Mar-23-18	Travel to and from initial conference; appear at initial conference	0.90	315.00	SI
Apr-10-18	Drafted Plaintiff's initial disclosures	0.30	105.00	SI
Apr-11-18	Telephone conference with Opposing counsel and mediator	0.50	175.00	SI
May-15-18	Drafted mediation statement	0.70	245.00	SI
May-21-18	Reviewed case in preparation for mediation	0.30	105.00	SI
May-22-18	Discussed with SI that OC threatened to move for sanctions by claiming our client was lying	0.10	45.00	MF
	Travel to and from mediation; attend mediation	2.60	910.00	SI
Jul-20-18	Telephone conference with opposing counsel regarding new counsel and defendants' request for extension of time to complete discovery	0.20	70.00	SI
Aug-14-18	Discussed with staff status of case	0.10	45.00	MF
Oct-04-18	Drafted notices of deposition	0.40	140.00	SI
Oct-09-18	Drafted responses and objections to Defendants' document requests and interrogatories	1.30	455.00	SI
Oct-24-18	Telephone confernece with mediator in advance of mediation	0.20	70.00	SI
Oct-25-18	Telephone confernece with opposing counsel	0.10	35.00	SI
Oct-26-18	Travel to and from mediation, appear at mediation	3.20	1,120.00	SI
Oct-29-18	Drafted notices of deposition	0.30	105.00	SI
Oct-31-18	Prepared client for deposition	0.70	245.00	SI
Nov-02-18	Prepared for depositions	1.40	490.00	SI
	Travel to and from depositions, defend	3.50	1,225.00	SI

	plaintiff's deposition; take defendant's deposition			
Nov-08-18	Travel to and from pretrial conference; appear at pretrial conference	1.30	455.00	SI
	Drafted status letter	0.20	70.00	SI
Nov-09-18	Drafted letter regarding settlement conference	0.10	35.00	SI
Nov-30-18	Drafted pretrial materials	3.10	1,085.00	SI
Dec-17-18	Drafted letter motion for extension of time to file pretrial materials	0.20	70.00	SI
Dec-26-18	Discussed with SI that the Defendants claim that our client made different claims to the DOJ	0.20	90.00	MF
	Drafted proposed voir dire	0.40	140.00	SI
Jan-03-19	Telephone conference with woman at Industrial Board of Appeals	0.20	70.00	SI
	Drafted letter to defense counsel regarding adjournment of hearing at Industrial board of appeals	0.30	105.00	SI
Jan-04-19	Organized documents for conference	0.25	25.00	PL
Jan-07-19	discussed case with SI the judge's decision to deny OC's motion to postpone trial for a hearing	0.20	90.00	MF
	Travel to and from FPTC; appear at FPTC	2.10	735.00	SI
Jan-14-19	Prepared for trial	3.80	1,330.00	SI
Jan-15-19	Prepared for trial with client	1.10	385.00	SI
	Prepared for trial	2.70	945.00	SI
Jan-16-19	Discussed with SI defendant's decision to postpone trial and go ahead with trial	0.10	45.00	MF
Jan-17-19	Discussed with SI whether we should confirm the interpreters since it is possible the defendants will declare bankruptcy	0.10	45.00	MF

	Discussed with SI the probability of defendants filing for bankruptcy; discussed OC's response to our inquiry about bankruptcy and requested that PP reserve interpreters for trial; discussed the strengths of our client with SI	0.30	135.00	MF
	prepared client for trial	3.00	300.00	PL
Jan-18-19	Discussed with SI what action to take in order to preclude defendants from presenting document when they cannot validate it; discussed with SI defendants' refusal to negotiate; discussed with SI the action by defendants of making false accusations against us and what she plans to do about the document defendants cannot validate	0.90	405.00	MF
	Drafted email response to Judge Failla regarding wage notice	0.20	70.00	SI
	Prepared for trial	4.60	1,610.00	SI
Jan-19-19	Prepared opening statement for trial	1.50	525.00	SI
Jan-21-19	Prepared client for trial	3.20	1,120.00	SI
	Prepared for trial	1.60	560.00	SI
Jan-22-19	Discussed with SI what occurred at the court	0.20	90.00	MF
	Discussed with PH developments in the case	0.10	45.00	MF
	Travel to and from trial; appear at trial	2.20	770.00	SI
	Telephone conference with opposing counsel and judge	0.20	70.00	SI
	Drafted letter regarding spread of hours and fixed rates in hospitality industry	0.40	140.00	SI
	Telephone conferences with opposing counsel regarding settlement	0.30	105.00	SI
Jan-23-19	Discussed with SI results of settlement conference	0.20	90.00	MF

Travel to and from settlement conference; appear at settlement conference	3.20	1,120.00	SI
Drafted settlement agreement	1.20	420.00	SI
Totals	65.70	\$22,251.25	

**DISBURSEMENTS**

Sep-22-17	Process Server (Service on Muzzarella Inc.)	65.00	
Dec-06-18	Transcript: Reporter Appearance + manuscript/condensed transcript	389.25	
Jan-17-19	Stationery/Supplies	58.59	
Jan-18-19	Stationery/Supplies	87.10	
Jan-21-19	interpreter fee	3,200.00	
Totals		\$3,799.94	
<b>Total Fee &amp; Disbursements</b>			<b>\$26,051.19</b>
<b>Balance Now Due</b>			<b>\$26,051.19</b>